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17 Attorneys for Defendant
18 Joseph Teixeira

19 UNITED STATES DISTRICT COURT
20 CENTRAL DISTRICT OF CALIFORNIA

21 CITY OF INGLEWOOD, a public entity,

22 Plaintiff,

23 vs.

24 JOSEPH TEIXEIRA and Does 1-10,

25 Defendants.

Case No. **2:15-cv-01815-MWF-MRW**

Assigned to the Hon. Michael Fitzgerald

**DECLARATION OF JOSEPH
TEIXEIRA IN SUPPORT OF
DEFENDANT'S MOTION TO
DISMISS (F.R.C.P. 12(b)(6)) AND
MOTION TO STRIKE (F.R.C.P.
12(f)); EXHIBIT B**

Hearing Date: June 22, 2015

Time: 10:00 a.m.

Courtroom: 1600

[Notice of Motion and Motion to Dismiss
(Rule 12(b)(6)); Notice of Motion and
Motion to Strike (Rule 12(f)); Request
For Judicial Notice; Declaration Of Dan
Laidman; Notice Of Lodging Of DVDs
with Exs. A, C-F; Notice Of Manual
Filing; and [Proposed] Orders Filed
Concurrently]

Action Filed: March 12, 2015

DECLARATION OF JOSEPH TEIXEIRA

I, Joseph Teixeira, declare and state as follows:

1. I am the defendant in this action. I am over eighteen years of age. I have personal knowledge of the facts contained in this declaration, except for those matters stated on information and belief, which I am informed and believe to be true. If called upon to testify, I could and would competently testify to these facts.

2. I have reviewed the Complaint in this action. Paragraph 19 references and links to the Internet addresses for six YouTube pages. These YouTube pages display videos that I created and posted to YouTube under an account that I maintain with the name "Dehol Truth."

3. Attached as **Exhibit A** to the concurrently submitted Notice of Lodging is a DVD containing true and correct copies of these six videos that I created and posted to YouTube, and that are referenced and linked to in Paragraph 19 of the Complaint. In particular:

a. **Exhibit A-1** (Video One): This video is available at <https://www.youtube.com/watch?v=UyCqRiZXRH8>. I created this video and posted it to YouTube at that address. It is titled "James Butts Accuses The City Clerk Of Election Fraud," or "James T. Butts Jr. Accuses City Clerk Yvonne Horton of Election Fraud!"

b. **Exhibit A-2** (Video Two): This video is available at <https://www.youtube.com/watch?v=ZruE0a1UF8g>. I created this video and posted it to YouTube at that address. It is titled "James T. Butts Jr. Misleads the Public About His Voter Registration."

c. **Exhibit A-3** (Video Three): This video is available at <https://www.youtube.com/watch?v=gUUZdTNe7CA>. I created this video and posted it to YouTube at that address. It is titled "Lying Politicians," or "James T Butts Jr Alibi or apology."

- 1 d. **Exhibit A-4** (Video Four): This video is available at
2 <https://www.youtube.com/watch?v=-5VQZrW7BVY>. I created this
3 video and posted it to YouTube at that address. It is titled "James T.
4 Butts Jr. exploits the Murder of Fredrick Martin for his own political
5 benefit."
6 e. **Exhibit A-5** (Video Five): This video is available at
7 <https://www.youtube.com/watch?v=MZKTiutCjdI>. I created this video
8 and posted it to YouTube at that address. It is titled "Mayor James Butts
9 Lies About Being a Hypocrite."
10 f. **Exhibit A-6** (Video Six): This video is available at
11 <https://www.youtube.com/watch?v=a1p3l0OmhGM>. I created this
12 video and posted it to YouTube at that address. It is titled "Inglewood
13 Mayor James Butts Lies, Hiding Dangerous Traffic Problems At The
14 Forum," or "Mayor James T Butts Jr Lies, Hiding Dangerous Traffic
15 Problems After Forum Event!"
16 4. True and correct copies of screenshots of these YouTube pages from my
17 account which are referenced and linked to in Paragraph 19 of the Complaint, and
18 which display the videos that I created that are contained in Exhibit A, are attached
19 as **Exhibit B** to this Declaration. In particular:
20 a. **Exhibit B-1** (Video One): This is a screenshot of the web page
21 <https://www.youtube.com/watch?v=UyCqRiZXRH8>.
22 b. **Exhibit B-2** (Video Two): This is a screenshot of the web page
23 <https://www.youtube.com/watch?v=ZruE0a1UF8g>.
24 c. **Exhibit B-3** (Video Three): This is a screenshot of the web page
25 <https://www.youtube.com/watch?v=gUUZdTNe7CA>.
26 d. **Exhibit B-4** (Video Four): This is a screenshot of the web page
27 <https://www.youtube.com/watch?v=-5VQZrW7BVY>.
28

e. **Exhibit B-5** (Video Five): This is a screenshot of the web page
<https://www.youtube.com/watch?v=MZKTiutCjdI>.

f. **Exhibit B-6** (Video Six): This is a screenshot of the web page
<https://www.youtube.com/watch?v=a1p3l0OmhGM>.

5. As referenced in Paragraph 19 of the Complaint and as reflected in Exhibit A-1 and Exhibit A-2, Video One and Video Two include clips from the July 20, 2010 Inglewood City Council meeting. A true and correct copy of the City's official video recording of this Council meeting, which I obtained from the City of Inglewood, is included on the DVDs attached as **Exhibit C** to the concurrently submitted Notice of Lodging.

6. As referenced in Paragraph 19 of the Complaint and as reflected in Exhibit A-3, Video Three includes clips from the May 22, 2012 Inglewood City Council meeting. A true and correct copy of the City's official video recording of this Council meeting, which I obtained from the City of Inglewood, is included on the DVDs attached as **Exhibit D** to the concurrently submitted Notice of Lodging.

7. As referenced in Paragraph 19 of the Complaint and as reflected in Exhibit A-6, Video Six includes clips from the February 11, 2014 Inglewood City Council meeting. A true and correct copy of the City's official video recording of this Council meeting, which I obtained from the City of Inglewood, is included on the DVD attached as **Exhibit E** to the concurrently submitted Notice of Lodging. The City's official video recording of the February 11, 2014 City Council meeting video is also available on the City of Inglewood's YouTube page at
<https://www.youtube.com/watch?v=PDwvv2XBu> 8.

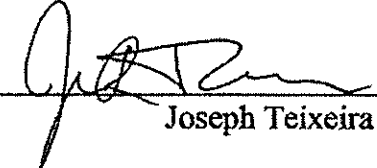
8. As referenced in Paragraph 19 of the Complaint and as reflected in Exhibit A-5, Video Five includes clips from the April 23, 2013 Inglewood City Council meeting. I do not have a copy of the City's official video recording of this Council meeting, but I am informed and believe that a copy of this video is included on the DVD attached as Exhibit F to the concurrently submitted Notice of Lodging.

1 On April 1, 2015, I submitted a request to the City under the California Public
 2 Records Act ("CPRA") for a copy of this video, and for copies of all of the other City
 3 Council meeting videos identified in the City's Complaint at page 9 (Complaint
 4 "Exhibit A"). As of the signing of this Declaration I have not received a response to
 5 this request.

6 9. Paragraph 19 of the Complaint indicates that Video Four includes clips
 7 from an April 11, 2013 Inglewood City Council meeting. I believe that this is a
 8 mistake based on an erroneous reference in Video Four to an April 11 date, and that
 9 the Inglewood City Council did not hold a meeting on that date. I believe that Video
 10 Four includes footage from a video recording of an April 9, 2013 meeting of the
 11 Inglewood City Council. I do not have a copy of the City's official recording of the
 12 April 9, 2013 Council meeting. I submitted a CPRA request to the City for a copy of
 13 this video on April 7, 2015. As of the signing of this Declaration I have not received
 14 a response to this request.

15 10. On April 1, 2015, I submitted a CPRA request to the City for copies of
 16 the copyright registration applications that are identified in the City's Complaint at
 17 page 9 (Complaint "Exhibit A"). As of the signing of this Declaration I have not
 18 received a response to this request.

19 I declare under penalty of perjury under the laws of the United States of
 20 America that the foregoing is true and correct, and that this declaration was executed
 21 this 15th day of April 2015, at Inglewood, California.

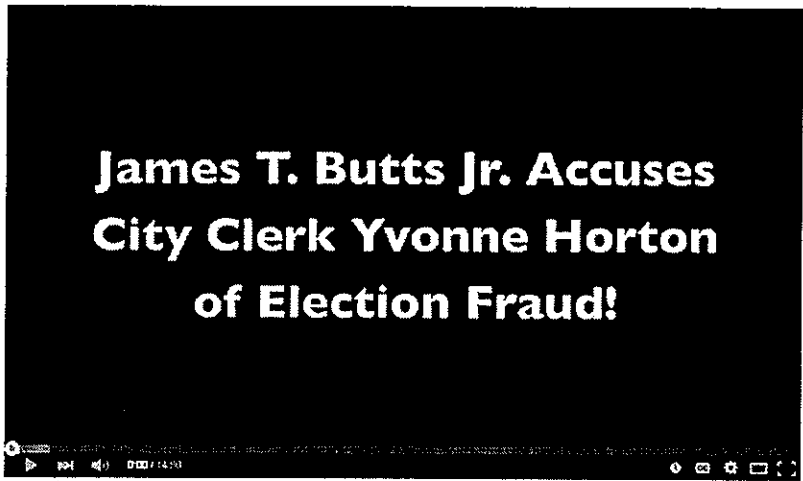
22
 23 
 24 Joseph Teixeira
 25
 26
 27
 28

**MANUALLY LODGED, NOTICE OF LODGING
EXHIBIT A**

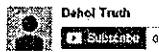


Exhibit A

EXHIBIT B



James Butts Accuses The City Clerk Of Election Fraud



Dahol Truth
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Published on Feb 15, 2014

Then candidate James T. Butts Jr. apparently accuses Inglewood City Clerk Yvonne Horton and her staff of Election Fraud while he breaks just about every City Council rule he can. See more of his bizarre behavior at: <http://inglewoodswatchdog.kix.com/any...>

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James Butts exploits the murder of Frederick Martin for his own political
by Dahol Truth
301 views



James T. Butts Jr. Misleads the Public About His Voter Registration.
by Dahol Truth
301 views



May 11, 2013 Detroit City Clerk Debate between D. Ema Wilcoxon and Janice
by WknewsCityClerk
446 views



James T Butts Jr Alibi or apology
by Dahol Truth
301 views



Former City Clerk, Stephanie Haas, confronts Board of Aldermen after
by Power Press
545 views



Mayor James Butts Lies About Being a Hypocrite
by Dahol Truth
301 views



Brown Act Violations By The Inglewood Planning Commission, August 6th 2014
by Dahol Truth
301 views



Steven Seagal: If The Truth Came Out, Obama Would Be Impeached
by Western Journalism
2,007,295 views



Mayor James T Butts Jr Lies, Hiding Dangerous Traffic Problems After Forum
by Inglewood's Watchdog
301 views



City clerk insults Christian Community
by Crickets4G1
615 views



James T Butts Jr Violates The Law To Get Relected #2
by Inglewood's Watchdog
214 views



Butts has a fit at the Block Club Captains meeting
by Ed Fleming
551 views



James Butts Lies Hiding Dangerous Traffic Problems After Forum Events 2
by Inglewood's Watchdog
174 views



DEATH BY BUTT-SHOT: NJ Woman CHARGED With MANSLAUGHTER in
by Heekya Hensley
6,575 views



@Twitter accuses Beyonce of shutting down 105 & park - AJ & FREE speak on
by Jovely3002
16,215 views



Baby got Back 2013 Keys on Main SLC.mp4
by James Dale Smith
651 views



The Percells - What Are Boys Made Of. 1963 His Master's Voice - POP 1154
by Dee Wade Warrington
331 views



Senator David Norris recommends giving HOMOPHOBES a kick up the arse!
by Nick's Menophore
625 views

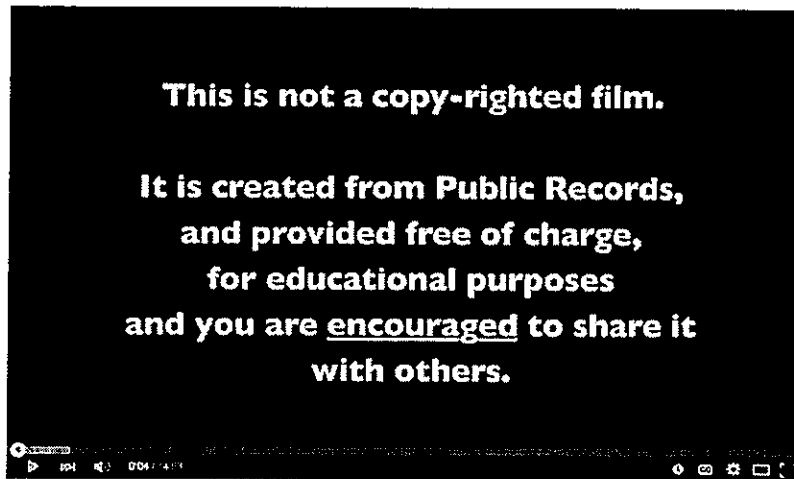


OUT OF BOUNDS EP. 7: Kissing 50 Cent, Meta World Punishment, Rodman hits
by theoutbounder.hq
961 views



Standing My Ground Against The Corruption In The Inglewood City
by sbm2000
247 views

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James T. Butts Jr. Misleads the Public About His Voter Registration.



Debol Truth



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Published on May 24, 2014

On July 28, 2010, "Mayoral Candidate" James Butts misled Inglewood's voters to hide the fact that he was not responsible enough to file his election documents on time. See more of his bizarre behavior at: <http://inglewoodswatchdog.wix.com/any...>

Category News & Politics
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James T Butts Jr Alibi or apology
by Debol Truth
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Butts has a fit at the Block Club Captains meeting
by Ed Fleming
651 views



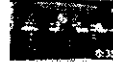
Mayor James Butts Lies About Being a Hypocrite
by Debol Truth
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James Butts Accuses The City Clerk Of Election Fraud
by Debol Truth
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Mayor James T Butts Jr Lies, Hiding Dangerous Traffic Problems After Forum
by Inglewood's Watchdog
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by Debol Truth
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sam butts jr House of blues remnant
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SAM "MAGIC SAM" BUTTS PRAISE BREAK (NHCC PRAISE BUMP)
by Vlog Entertainment
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Inglewood Street Tech - Darren Roth - General Foreman - Mayor James T. Butts
by Inglewood Gas
206 views



STADIUM APPROVED!!! "Rams 2 Inglewood" (Raw Video)
by RacePolarKane
1,055 views



James Butts exploits the murder of Fredrick Martin for his own political
by Debol Truth
124 views



Inglewood's Illiterate Councilman George Dotson Quickly Leaves the Room
by Ed Fleming
70 views



Inglewood Mayor James T. Butts on Stan Kroenke's NFL Stadium being shovel
by Eric Greer
220 views



Consumer Report: racial retaliation by Hyundai Motor America
by ingalewoodwatchdog
16,172 views



Mayor Butts at Inglewood Town Hall
by Ed Fleming
35 views



Super #1 Movie CLIP - No Cuts, No Butts (2010) HD
by MOVIECLIPS
116,334 views

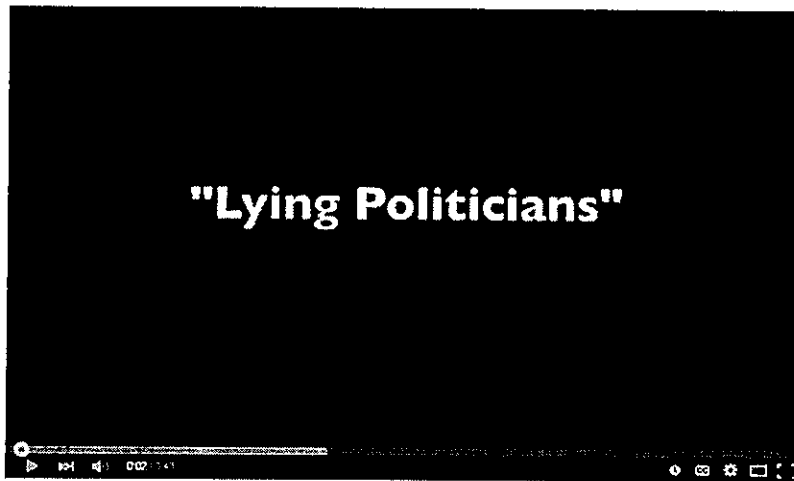


James T. Butts Inglewood, City of Inglewood Daniel Tabor Mayor Race.
by InglewoodRazors
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Inglewood Mayor Race Candidate James T Butts run off with Inglewood Mayor
by JamesButtsJr
145 views

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James T Butts Jr Alibi or apology



301+ views

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Published on Dec 21, 2013

Inglewood's crooked Mayor James T. Butts Jr. nervously LIES, trying to establish an alibi for why he helped violate State Law for about 9 months, hiding the fact that IPC repeatedly refused to investigate a shooting. See more of his bizarre behavior at: <http://inglewoodswatchdog.wik.com/any>.

Category: News & Politics
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- Butts has a fit at the Block Club Captains meeting
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by University of Chicago
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by InglewoodReports
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- Mayor Butts at Inglewood Town Hall
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by Ed Fleming
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- Inglewood Mayor James T. Butts on Stan Kroenke's NFL Stadium bring shovel
by Eric Geyer
220 views
- Mayor's Town Hall Meeting
by Inglewood Today Newspaper
125 views
- Consumer Report: racial retaliation by Hyundai Motor America
by Inglewood's Watchdog
25,172 views

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James T. Butts Jr.
exploits the Murder of
Fredrick Martin
for his own political benefit.

James Butts exploits the murder of Fredrick Martin for his own political benefit

Debol Truth
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Published on Mar 3, 2014
Short documentary about the tragic murder of Inglewood resident Fredrick Martin and how an unethical politician, James Butts, apparently exploited the death to gain national publicity for himself, only to later completely abandon his guarantees that the killers would be brought to justice. See more of his bizarre behavior at: <http://inglewoodwatchdog.wix.com/any...>

Category: News & Politics
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Mayor James Butts Lies About Being a Hypocrite
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James T Butts Jr Alibi or apology
by Debol Truth
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James T Butts Jr Violates The Law To Get Reelected #2
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Butts has a fit at the Block Club Captains meeting
by Ed Fleming
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Victoria's Secret Model Adriana Lima Reveals a Lights Out Moment | PEOPLE
by PEOPLE
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Mayor Butts at Inglewood Town Hall
by Ed Fleming
45 views

Jack Straw says about you "LET THE CUNTS HAVE IT"
by Handbitchon
264 views

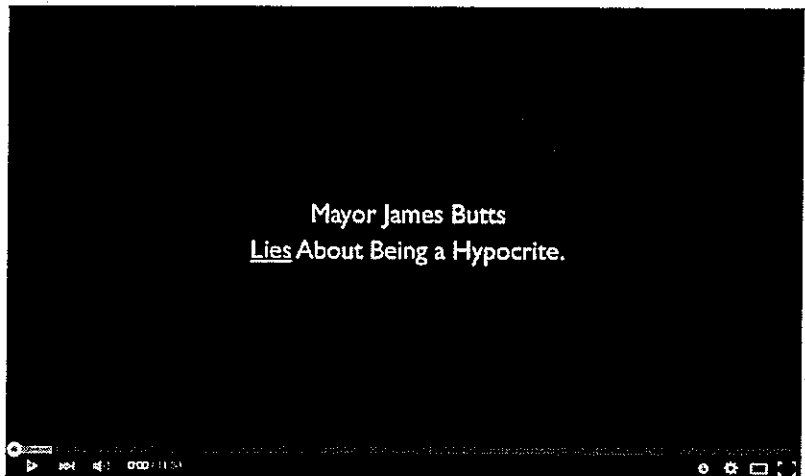
James T. Butts Inglewood, City of Inglewood Daniel Tabor Mayor Race.
by InglewoodResults
300 views

James T. Butts, and two councilmembers — Padilla & Franklin Leave while Maxine
by Ed Fleming
65 views

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Language: English Country: Worldwide Safety: Off History Help

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Mayor James Butts Lies About Being a Hypocrite



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Published on Sep 28, 2014

After being publicly exposed as the worst kind of a hypocrite, James Butts desperately tries to lie to defend himself. Unfortunately, he can't make the video evidence go away.

Category: News & Politics
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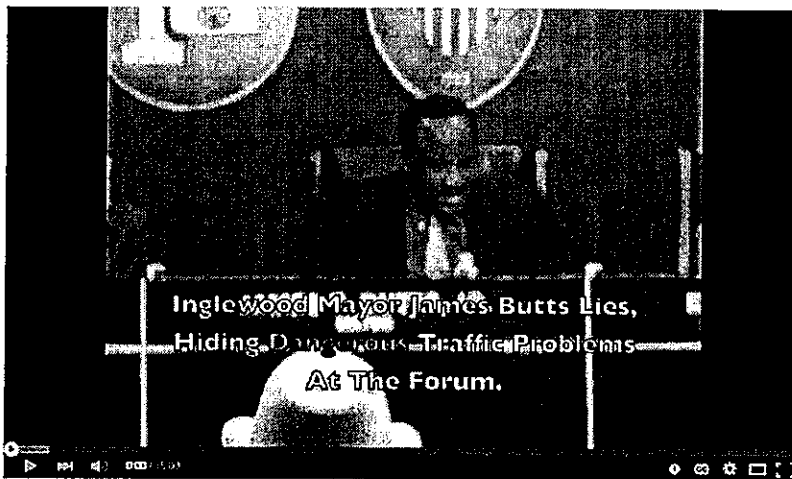
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by TTT Interviews
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- James T. Butts Inglewood, City of Inglewood Daniel Tebor Mayor Race.**
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Mayor James T Butts Jr Lies, Hiding Dangerous Traffic Problems After Forum Events

Inglewood's Watchdog

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Published on Sep 12, 2014

More video evidence that James T. Butts Jr. will lie, and endanger the safety of the public, just to make himself look good

Category Education
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by jamesbutts4mayor
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by InglewoodReports
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- This January 11, 2011 Elect James T. Butts for Mayor of Inglewood.**
by jamesbutts4mayor
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- Inglewood California Mayor Race 2011 January 11 Chief Of Police James Butts**
by jamesbutts4mayor
274 views

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EXHIBIT C**

Exhibit C

Part 1

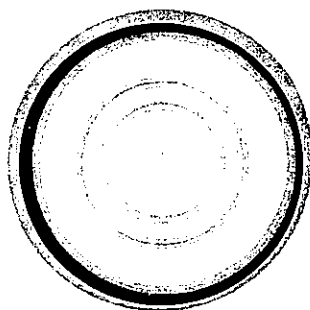
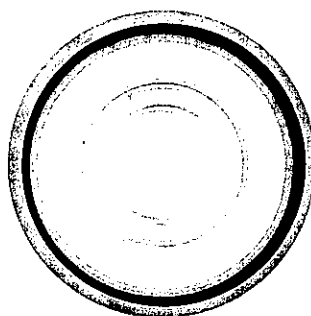


Exhibit C

Part 2



**MANUALLY LODGED, NOTICE OF LODGING
EXHIBIT D**

Exhibit D

Part 1

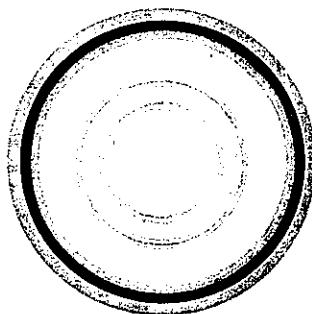
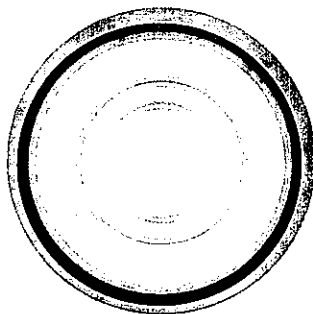


Exhibit D

Part 2



**MANUALLY LODGED, NOTICE OF LODGING
EXHIBIT E**

Exhibit E

